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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

**SPENCER NORMAN, KIEFER NORMAN,
COURTNEY NORMAN AND HELEN S. NORMAN**

VS.

**CAMDEN COUNTY, BRIAN D. FIENE, DWIGHT D. FRANKLIN,
RICHARD B. DZIADOSZ, LARRY L. RUTHERFORD,
AND JAMEE L. WATSON**

Case No. 2:12-CV-04210-NKL

DEPOSITION OF MATTHEW SOUTHARD

JULY 2, 2013

Exhibit

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1 (WHEREUPON, the deposition began at
2 1:32 p.m.)

3 MATTHEW L. SOUTHARD, being sworn, testified as
4 follows:

5 DIRECT EXAMINATION BY MR. HENSON:

6 Q. Sir, would you please state your full
7 name and address for the record.

8 A. Matthew L. Southard, 16550 Highway C,
9 Phillipsburg, Missouri.

10 Q. Mr. Southard, my name is Keith
11 Henson. I introduced myself to you outside. We
12 are here today to take your deposition in a lawsuit
13 that is styled Norman, et al versus Camden County,
14 et al, and I will tell you that I represent the
15 Defendants, which would be Camden County, Missouri,
16 Sheriff Dwight Franklin, Sergeant Brian Fiene,
17 Deputy Richard Dziadosz, Deputy Jamee Watson and
18 Deputy Larry Rutherford in this lawsuit.
19 Mr. Carnie who is here today and has introduced
20 himself to you represents the Norman family in this
21 lawsuit.

22 So you understand we're taking your
23 deposition in that lawsuit?

24 A. Yes, I do.

25 Q. Are you appearing here today pursuant

1 Mid-County, they're also manned 24 hours, but
2 they're both volunteer also.

3 Q. Are there times when both fire
4 department and Camden County EMS will arrive on
5 scenes?

6 A. Yes, most of the time.

7 Q. Do you know that night whether or not
8 the fire department was called out?

9 A. I do not know.

10 Q. When you got to the scene that
11 evening, it looks like you arrived at 5:01 a.m.; is
12 that correct?

13 A. Yes.

14 Q. And you said that patient contact was
15 at 5:02 --

16 A. Yes.

17 Q. -- a.m.; is that correct?

18 A. Right.

19 Q. Did you learn any additional
20 information about this call as you were en route to
21 the scene other than the Taser had been deployed?

22 A. No, I didn't, not -- not that I can
23 recollect.

24 Q. All right. And there's nothing
25 contained in the report that indicates you learned

1 And I'm sure you've been through this
2 before, but we don't care what you do. If you want
3 to read it and sign it, that's fine. If you want
4 to waive your right to read and sign, which is what
5 most people do, that's fine, too.

6 THE WITNESS: I'll waive it. That's
7 fine.

8 (SIGNATURE WAIVED.)

9 (WHEREUPON, the deposition concluded
10 at 2:54 p.m.)

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